UNITED STATES DISTRICT COURT
NORTHER DISTRICT OF TEXAS
DALLAS DIVISION

SUSAN CHANG, as Next Friend of Alison Chang, a minor, And Justin Ho-Wee Wong	§	
Plaintiffs,	§	CAUSE NO. 3:07-CV-01767
v.	§	
Virgin Mobile Pty Ltd.,	§	
Defendant.	§	

PLAINTIFFS' SECOND MOTION TO EXTEND DEADLINE TO RESPOND TO DEFENDANT'S MOTION TO DISMISS

Plaintiffs file this Motion for Continuance, respectfully requesting that the Court extend the deadline to file their response to Defendant's Motion to Dismiss for a period of 60 days until June 9, 2008.

Given that Defendant has objected to almost every one of Plaintiffs' jurisdictional discovery requests and is unable to produce its corporate representatives for deposition until at least the week of March 17, it is unlikely that Plaintiffs will be able to attain—much less review—the evidence needed to respond to Defendant's motion to dismiss by April 9, 2008. Plaintiffs, therefore, request this continuance so that they can coordinate and conduct depositions of Virgin Mobile's corporate representatives (all of whom reside oversees) and obtain, through a motion to compel if necessary, information responsive to their first set of written discovery to Defendant.

For these reasons, Plaintiffs respectfully request that the Court extend their deadline to respond to Defendant's motion to dismiss for a period of 60 days until June 9, 2008.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on the 22 day of February 2008, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the Court's electronic case filing system. The system sent a "Notice of Electronic Filing" to the following attorneys of record, all of whom have consented to accept this Notice as service of the document:

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/s/ Ryan H. Zehl______________________
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